



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 30 2015

REPLY TO THE ATTENTION OF:

LU-9J

Ms. Jill Barker
CEO/Superintendent
Anderson Preparatory Academy
101 West 29th Street
Anderson, Indianapolis 46016

RE: Remediation Plan for Fluorescent Light Fixtures Containing Polychlorinated Biphenyls

Dear Ms. Barker:

The U.S. Environmental Protection Agency has reviewed your May 19, 2015 Remediation Plan for Fluorescent Light Fixtures Containing Polychlorinated Biphenyls at the Anderson Preparatory Academy (Anderson) submitted as a self-implementing plan under 40 Code of Federal Regulations (CFR) §761.61(a).

The facility consists of a 33,845 square foot, one story building on 10.080 acres. The building was erected in 1955. The site is owned by Central Indiana Military Academy. The site is currently used as an elementary school for kindergarten through second grade and operates as a public charter school.

On Tuesday, September 23, 2014, a fluorescent light ballast failed in a classroom at Anderson Preparatory Academy Elementary School. Subsequent investigations found burned potting material or smoke residue on fluorescent fixtures throughout the facility.

In April of 2015, Anderson Preparatory Academy and Alliance Environmental Group conducted a visual inspection and inventory of all light fixtures within Anderson Preparatory Academy Elementary School. Fluorescent light fixtures were opened and the fixture surfaces were observed for any accumulation of burned potting material or smoke residue. A total of 218 light fixtures were identified which require remediation, including 161 fixtures with burned potting material residue and 57 light fixtures with smoke residue.

The cleanup plan consists of the removal and disposal of light fixtures which have smoke residue, accumulated burned potting material, or unlabeled ballasts.

The EPA approves your May 19, 2015 Remediation Plan subject to the following conditions:

1. Upon removal of the light fixtures, Anderson will perform post-removal wipe sampling using a standard wipe test (40 Code of Federal Regulations (CFR) §761.123) at any areas where visible traces of smoke residue or accumulated potting material is found on any surface outside of the light fixture in accordance with 40 CFR §761 Subpart P to ensure that the decontamination standard at 40 CFR §761.79(b)(3)(i)(A) is met.
2. Removed ballasts will be disposed of as PCB waste in accordance with 40 CFR §761.50(b)(2). Removed light fixtures will be disposed of as PCB waste in accordance with 40 CFR §761.61(a)(5)(ii)(B) or §761.61(b).
3. You must prepare a Cleanup Completion Report that documents how you conducted the cleanup in accordance with the applicable regulatory requirements and this approval. This report is due one month after the completion of the cleanup work.
4. This does not constitute a determination by EPA that the transporters or disposal facilities selected by Anderson are authorized to conduct the activities set forth in the Remediation Plan. Anderson is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state, and local statutes and regulations.

This letter does not relieve Anderson Preparatory Academy from compliance with any other federal, state or local regulation and does not preclude EPA from initiating any enforcement action, including an action seeking injunctive relief or civil penalties for any violation of federal regulations.

If you have any questions, please contact Peter Ramanauskas of my staff at ramanauskas.peter@epa.gov or (312) 886-7890.

Sincerely,



Jose G. Cisneros, Chief
Remediation and Reuse Branch

Enclosure

cc: George Ritchotte, IDEM